

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ISLAND JAY, INC,

Plaintiff,

v.

MYLOCKER.COM, LLC,

Defendant.

CASE NO. 19-11501

HON. MARK A. GOLDSMITH

PLAINTIFF’S SUPPLEMENT TO MOTION FOR ORDER HOLDING
DEFENDANT IN CONTEMPT FOR FAILURE TO COMPLY WITH
DEFAULT JUDGMENT ORDER

COMES NOW, Plaintiff ISLAND JAY, INC. (“Island Jay”), through counsel, and by way of supplement to the pending Motion for Order Holding Defendant in Contempt for Failure to Comply with Default Judgment Order (ECF No. 24) (“Motion for Contempt”), states as follows.

At the hearing of January 13, 2022, the Court directed Plaintiff’s counsel to supplement the record with proof that Robert Hake, Defendant’s CEO and registered agent, was served a copy of the Motion for Contempt via U.S. Certified Mail within seven (7) days. Island Jay has moved to hold Mr. Hake jointly and several liable under the Default Judgment Order since, as registered agent for MyLocker.com LLC (“MyLocker”), Mr. Hake received service of the Default Judgment Order and therefore has personal knowledge of its terms. Attached as Exhibit A, please find a

U.S. Mail Certified Mail Receipt and Tracking Report to establish that a copy of the Default Judgment was served at the address of MyLocker's registered agent.

Unfortunately, the attorney who likewise served the Motion for Contempt is on emergency leave from the office this week due to deaths in his immediate family. In his absence, the undersigned is unable to locate the U.S. Mail Certified Mail Receipt regarding service of the Motion for Contempt on MyLocker. Accordingly, as of this date, the Motion for Contempt and related exhibits are being re-served on MyLocker and Mr. Hake, the latter both individually and in his capacity as registered agent. Attached as Exhibit B, please find U.S. Certified Mail Receipts for today's service. With the Court's permission, Island Jay will supplement the record further with proof of the original service of the Motion for Contempt, once it becomes available, and/or signed return receipts for the re-service of this date.

CERTIFICATE UNDER E.D. MICH LR 5.1(a)

I, John Shoreman, hereby certify that this document complies with Local Rule 5.1(a), including: double-spaced (except for quoted materials and footnotes); at least one-inch margins on the top, sides, and bottom consecutive page numbering; and type size for all text and footnotes that is no smaller than 10-1/2 characters per inch (for non-proportional fonts) or 14 point (for proportional fonts). I also certify that it is the appropriate length. Local Rule 7.1(d)(3).

Respectfully submitted this 20th day of January, 2022.

/s/ John Shoreman

John Shoreman

McFadden & Shoreman

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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing Plaintiff's Supplement to Motion for Order Holding Defendant in Contempt for Failure to Comply with the Default Judgment Order. I further certify that the foregoing was served on the following via U.S. Certified Mail (Return Receipt Requested) on the following:

MyLocker.com, LLC
Robert Hake (Registered Agent)
1300 Rosa Parks Blvd.,
Detroit, MI 48216

/s/John Shoreman
John Shoreman